

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

TROVERCO, INC.,

Debtor.

Chapter 11

Case No. 17-44474

Hearing Date and Time:
July 5, 2017, 10:30 a.m.

Hearing Location:
Courtroom 7 South, Thomas F.
Eagleton U.S. Courthouse

Response Due:
July 5, 2017

DEBTOR'S MOTION FOR EXPEDITED HEARING ON FIRST DAY MOTIONS

Troverco, Inc., the above-captioned debtor and debtor-in-possession (the “Debtor”), by and through its proposed counsel, for its Motion for Expedited Hearing on First Day Motions (the “Motion”), states as follows:

1. On June 29, 2017 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.
2. The Debtor continues in the operation and management of its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
3. No trustee, examiner or official committee has been appointed in this chapter 11 case.
4. Simultaneously with the filing of this Motion, the Debtor filed the following first day motions (collectively, the “Motions”)

- (a) Debtor’s Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtor to Pay Certain Prepetition Wages, Compensation, and Employee Benefits and Continue Payment of Wages, Compensation and Employee Benefits in the Ordinary Course of Business and

(II) Authorizing Applicable Banks and Other Financial Institutions to Process and Pay All Checks Presented For Payment and to Honor All Funds Transfer Requests Made By the Debtor Related Thereto

- (b) Debtor's Motion for Entry of an Order Authorizing Continued Use of the Debtor's Existing Cash Management System, Bank Accounts, and Business Forms
- (c) Debtor's Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtor to Continue Prepetition Insurance Coverage and (II) Authorizing and Directing Financial Institutions to Honor Related Checks and Transfers
- (d) Debtor's Motion for Entry of an Order (I) Authorizing Payment of Certain Prepetition Taxes and Fees and (II) Authorizing Financial Institutions to Process and Cash Related Checks and Transfers
- (e) Debtor's Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service on Account of Prepetition Invoices, (II) Deeming Utility Providers to Have Adequate Assurance of Future Payment, and (III) Establishing Procedures for Resolving Requests for Additional Assurance
- (f) Debtor's Motion for Entry of an Order Extending the Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, and Statement of Financial Affairs

5. Local Rule ("L.R.") 9013-2(A) provides that an expedited hearing—one occurring within 10 days of the filing of a motion—may be granted upon movant's "written motion, setting forth the reason the matter should be heard on an expedited . . . basis." The Local Rules also recognize the need for an expedited hearing on first day matters. L.R. 9013-3(A)(1).

6. The Motions are essential to maintain continuity in Debtor's business operations, thereby making a successful reorganization more likely.

WHEREFORE, Debtor respectfully requests that the Court enter an order permitting the Debtor to present the Motions for hearing on July 5, 2017 at 10:30 a.m. (Prevailing Central Time).

Dated: June 30, 2017
St. Louis, Missouri

Respectfully submitted,

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*Proposed Co-Counsel to the Debtor and
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